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14 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
*Brandon Vera, and Kyle Kingsbury*

15 [Additional counsel appear on signature page]

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 **Cung Le, Nathan Quarry, Jon Fitch, Brandon**  
**Vera, Luis Javier Vazquez, and Kyle**  
20 **Kingsbury on behalf of themselves and all**  
**others similarly situated,**

21 **Plaintiffs,**

22 **vs.**

23 **Zuffa, LLC, d/b/a Ultimate Fighting**  
24 **Championship and UFC,**

25 **Defendant.**

Case No.: 2:15-cv-01045 RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE TO**  
**LODGE MATERIALS UNDER SEAL RE**  
**PLAINTIFFS' EMERGENCY MOTION**  
**TO COMPEL PRODUCTION OF**  
**DOCUMENTS WITHHELD ON**  
**PRIVILEGE GROUNDS AND FOR**  
**OTHER RELIEF**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(a),  
2 and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective Order”) issued by  
3 this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,  
4 Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others  
5 similarly situated (collectively, “Plaintiffs”) hereby move this Court for leave to lodge certain  
6 documents under seal related to their Emergency Motion to Compel Production of Documents  
7 Withheld on Privilege Grounds and for Other Relief.

8 Under Section 14.3 of the Protective Order, documents designated Confidential or Highly  
9 Confidential – Attorneys’ Eyes Only “shall be provisionally lodged under seal with the Court, and  
10 redacted papers shall be publicly filed. Within 5 days of the materials being lodged with the Court,  
11 the Party claiming protection shall file motion to seal setting forth the bases for sealing and proper  
12 authority under *Kamakana v. City & County of Honolulu*, 447 F.3d 1172 (9th Cir. 2006), or some  
13 other applicable authority.” Accordingly, Plaintiffs seek leave to lodge the following documents  
14 under seal.

15 First, Plaintiffs seek leave to lodge under seal portions of their Emergency Motion to  
16 Compel Production of Documents Withheld on Privilege Grounds and for Other Relief. The sealed  
17 portions refer to materials that have been designated Confidential or Highly Confidential –  
18 Attorneys’ Eyes Only by Zuffa or Group One.

19 Second, Plaintiffs seek leave to lodge under seal Exhibits 1, 2, 4, 5, 7, 14, 15, 16, 17, 18, 19,  
20 and 20 to the Weiler Declaration, which are—or refer to—documents that have been designated  
21 Confidential or Highly Confidential – Attorneys’ Eyes Only.

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1 Plaintiffs have filed all of these documents under seal, in accordance with the Court's ECF  
2 system, with the instant motion. Plaintiffs have publicly filed placeholders for redacted versions of  
3 these documents with the Court, and will serve un-redacted versions of these documents on  
4 Defendant.

5 DATED this 30th day of June, 2017.

6 **JOSEPH SAVERI LAW FIRM, INC.**

7 By: /s/ Kevin E. Rayhill

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of June, 2017, true and correct copies of the documents listed below were served via the United States District Court CM/ECF system on all parties or persons requiring notice.

- **PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL**
- **[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO SEAL**

By:

/s/ Kevin E. Rayhill

Kevin E. Rayhill